

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA

In re:

Red River Subs, Inc

Bankr. No. 24-30010

*dba* Erbert and Gerbert's - Fargo  
*dba* Erbert and Gerbert's - Bismarck  
*dba* Erbert and Gerbert's - Moorhead

Chapter 11

Debtor.

---

MOTION TO APPEAR BY TELEPHONE

---

Sarah J. Wencil, Trial Attorney for the U.S. Trustee, respectively moves this Court to enter an order under Local Rule 5001-1 allowing Assistant U.S. Trustee Robert Raschke or his designated attorney to appear by telephone on Friday, January 19, 2024 at 2:00 p.m. on the “first day” interim hearings.

1. The U.S. Trustee has no substantive objections to interim relief. The U.S. Trustee does not anticipate submitting exhibits or examining witnesses.
2. Travel to Fargo, North Dakota would be unduly burdensome and expensive.

WHEREFORE, Counsel requests that the United States Trustee be allowed to appear by telephone.

Dated: January 17, 2024

MARY R. JENSEN  
ACTING U.S. TRUSTEE REGION 12

/s/ Sarah J. Wencil  
Sarah J. Wencil  
Office of the U.S. Trustee  
Suite 1015 U.S. Courthouse  
300 South Fourth St.  
Minneapolis, MN 55415  
Telephone: (612) 334-1366  
Sarah.J.Wencil@usdoj.gov

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

**In re:**

**Red River Subs, Inc**

**Bankr. No. 24-30010**

***dba Erbert and Gerbert's - Fargo***  
***dba Erbert and Gerbert's - Bismarck***  
***dba Erbert and Gerbert's - Moorhead***

**Chapter 11**

**Debtor.**

---

**CERTIFICATE OF SERVICE**

---

Sarah J. Wencil, an employee of the U.S. Trustee office, hereby certifies the filing of this document caused service via CM/ECF upon all CM/ECF recipients.

Dated: January 17, 2024

/s/ Sarah J. Wencil  
Sarah J. Wencil